

DECLARATION OF STACY JOHNSON-SWEANY

I, Stacy Johnson-Sweany, declare under penalty of perjury under the laws of the United States of America that the following is true and correct:

1. I was retained to work at GS Labs as a site manager for its COVID-19 testing operation in Lee's Summit, Missouri.

2. I worked for GS Labs in Lee's Summit as an independent contractor for approximately three weeks in December of 2020.

3. GS Labs gave me very little training before I was asked to manage the Lee's Summit site and I had no prior background running a medical facility or laboratory.

4. When I first began working at GS Labs, it refused to accept customers that wanted to pay out of pocket for COVID testing.

5. GS Labs then began accepting out of pocket customers. I believe this occurred a few weeks after I began working there. My understanding was that payments were made by credit card only.

6. I never saw or heard of a person paying \$380 out of pocket for a COVID-19 test at GS Labs. When I observed records showing cash payments, each person paid a little over \$100 per test.

7. For insured customers, GS Labs management instructed me that company policy was to collect samples for all three tests (antibody, antigen, PCR) unless the person being tested refused. During my time working at GS Labs we stopped doing PCR testing and only took antibody and antigen samples. We were given written scripts to use with customers and told to read the script without stopping to ask for questions or consent and then immediately perform all testing available. Owners and management of GS Labs from Nebraska, including Kirk Thompson, Chris Brammer,



and Gabe Sullivan, instructed staff not to give the people being tested an option, and to take samples for all tests unless the person refused.

8. After GS Labs began accepting out of pocket customers, GS Labs management instructed me that the company's policy was to administer only one test for uninsured people, almost always an antigen test, unless the customer asked for several tests.

9. I observed many serious problems with the administration of COVID-19 tests and delivery of results at GS Labs. As an example, on many occasions one person's results were mixed up and placed in the wrong person's file. Other times, incorrect results were accidentally marked on the records. Customers called frequently about results not being sent on all three types of tests or the wrong person's results being delivered. On occasion PCR test swabs from Lee's Summit were not timely delivered to Omaha, Nebraska for testing resulting in questionable reliability. I also overheard that PCR testing was not timely completed once the test swabs arrived in Omaha. Sometimes when the facility was busy or we were short-staffed, antigen and antibody test samples were not tested immediately and would pile up for processing. Also, the temperature in the RV where the antibody and antigen tests were conducted was below room temperature in the mornings.

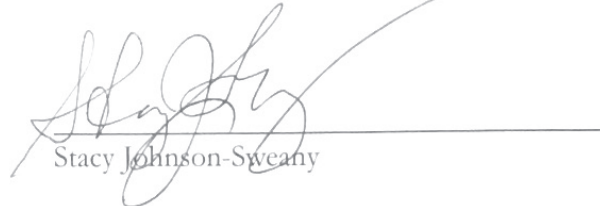
10. I observed problems with testing like those described above approximately 10 times per day and believe they may have impacted many more tests.

11. One time, we were notified that a shipment of antigen tests was not producing reliable results. I understand several GS Labs locations received tests from the lot that was thought to be inaccurate. A manager from Nebraska ordered us to use the tests anyway and not readminister the testing that had already been done. An incident form was completed by the head lab tech in Lee's Summit and was submitted to GS Labs management in Nebraska. I don't know how many tests were impacted but would estimate that it was many hundreds.

12. GS Labs owners and management did not provide sufficient PPE (personal protective equipment) to safely operate the facility. The facility lacked sufficient gloves, N-95 masks, and gowns.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE
AND CORRECT.

Executed on December 8, 2021



Stacy Johnson-Sweany